

1 PARSONS BEHLE & LATIMER
2 Jim Butler, Nevada Bar ID No. 8389
3 Ashley C. Nikkel, Nevada Bar ID No. 12838
4 50 West Liberty Street, Suite 750
5 Reno, NV 89501
6 Telephone: 775.323.1601
7 Facsimile: 775.348.7250
8 jbutler@parsonsbehle.com
9 anikkel@parsonsbehle.com

10 *Attorneys for Defendant*
11 *KG Mining (Bald Mountain) Inc.*

12 **UNITED STATES DISTRICT COURT**

13 **DISTRICT OF NEVADA**

14 LAURA LEIGH, individually, and WILD
15 HORSE EDUCATION, a non-profit
16 corporation,

17 Plaintiffs,

18 vs.

19 INTERIOR BOARD OF LAND APPEALS,
20 UNITED STATES DEPARTMENT OF
21 INTERIOR, BUREAU OF LAND
22 MANAGEMENT, and KG MINING INC.,

23 Defendants.

Case No. 3:25-CV-00039-ART-CSD

DEFENDANT KG MINING (BALD
MOUNTAIN) INC.'S JOINDER TO
FEDERAL DEFENDANTS' RESPONSE
TO PLAINTIFFS' MOTION FOR
JUDICIAL NOTICE

24 Defendant KG Mining (Bald Mountain) Inc.¹ ("KG Mining"), by and through its
25 undersigned counsel of record, hereby joins in Federal Defendants' Response to Plaintiffs' Motion
26 for Judicial Notice (ECF No. 45) and corresponding Errata (ECF No. 46) ("Federal Defendants'
27 Response").

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¹ The caption names KG Mining Inc. as a Defendant in the action. No such corporate entity exists. KG Mining (Bald Mountain), Inc. holds the authorization for the Juniper Project and appeared as Intervenor in the underlying Interior Board of Land Appeals action.

1 KG Mining expressly adopts and incorporates all arguments presented in the Federal
2 Defendants' Response that respond to Plaintiffs' Motion for Judicial Notice (ECF No. 44)
3 ("Motion").

4 DATED this 15th day of September, 2025.

5 PARSONS BEHLE & LATIMER

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7 By: /s/ Ashley C. Nikkel
8 Jim Butler, Nevada Bar ID No. 8389
9 Ashley C. Nikkel, Nevada Bar ID No. 12838
10 50 West Liberty Street, Suite 750
11 Reno, NV 89501
12 Telephone: 775.323.1601
13 Facsimile: 775.348.7250
14 jbutler@parsonsbehle.com
15 anikkel@parsonsbehle.com

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17 *Attorneys for Defendant*
18 *KG Mining (Bald Mountain) Inc.*
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CERTIFICATE OF SERVICE

I hereby certify that I am an employee of the law firm of Parsons Behle & Latimer and that on the 15th day of September, 2025, I filed a true and correct copy of the foregoing document, **DEFENDANT KG MINING (BALD MOUNTAIN) INC.'S JOINDER TO FEDERAL DEFENDANTS' RESPONSE TO PLAINTIFFS' MOTION FOR JUDICIAL NOTICE**, with the Clerk through the Court's CM/ECF system, which sent electronic notification to all registered users as follows:

Brent M. Resh, Esq.
Brent Resh Law, PLLC
2104 La Solana Way
Las Vegas, NV 89102
Email: brent@brentreshlaw.com

Attorneys for Plaintiffs

Jessica L. Blome, Esq.
J. Rae Lovko, Esq.
Greenfire Law, PC
2748 Adeline St., Suite A
Berkeley, CA 94703
Email: jblome@greenfirelaw.com
Email: rlovko@greenfirelaw.com

Attorneys for Plaintiffs

Sue Fahimi, Esq.
Nicole Leibow, Esq.
United States Attorney's Office
501 Las Vegas Blvd., Suite 1100
Las Vegas, NV 89101
Email: nicole.leibow@usdoj.gov

Attorneys for Federal Defendants

/s/ Nancy A. Prout
Employee of Parsons Behle & Latimer